

REMARKS

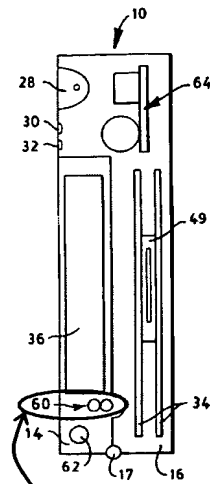
This application is believed to be in condition for allowance at the time of the next Official Action.

Applicants wish to thank Examiners Garber and Henn for their time in the personal interview of May 4, 2005.

As discussed during such interview, the Official Action of February 10, 2005 rejects claim 29 under 35 USC §103 as being unpatentable over DOUGLAS in view of ODA. Reconsideration and withdrawal of this rejection are respectfully requested for the following reasons:

The Official Action identifies those features of the invention recited in claim 29 considered to be disclosed by the primary DOUGLAS reference, and those attributed to ODA. In the analysis underlying the rejection, the Official Action identifies those features lacking from DOUGLAS, among which are developing rollers. The developing rollers are recited in the penultimate paragraph of rejected claim 29.

Applicants note, however, that the primary DOUGLAS reference does, in fact, disclose such feature, as is clear from the Figure 4A below with the highlighted rollers 60, as well as a related passage from column 5 of DOUGLAS:



used in the printing operation. Following exposure, a sheet<sup>35</sup> from film pack 36 is engaged by pressure means, such as a pair of processing rollers 60 powered by a processing motor 62, and ejected from photographic apparatus 10. For some types of photosensitive medium, the pressure means also serve to distribute a chemical developer over the photosen-<sup>40</sup>sitive surface of the sheet being ejected.

As the primary DUOGLAS reference clearly points out, the rollers 60 are characterized as pressure means that, in addition to advancing the sheet from the film pack, serve to distribute the chemical developer over the photosensitive surface of the sheet being ejected.

The Official Action relies on the secondary, Japanese language ODA reference for its asserted teachings in connection with an elongated printing head, head moving mechanism, power source, head driver, and developing rollers. As noted above, the primary DOUGLAS reference discloses the rollers, however.

These physical features are described in the ODA reference in connection with a photographic-type copying device. It is evident that the device described by ODA does not include the functions of a camera. Rather, it is merely a standalone photocopier.

As is necessary in any rejection under 35 USC §103(a) that combines references, the Official Action defines the motivation offered as underlying the combination. In this case, the Official Action states:

The device of ODA is able to provide a cheap and small instant photography-type reproducing unit without the need for a large power supply (paragraph 0013). Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to use the instant photography type reproducing unit or 'printing device' of DOUGLAS to create a sharp and small electronic still camera which does not require a large power supply.

Applicants suggest that the principal feature for which the secondary ODA et al. reference is offered cannot be the power supply. While there is no question that the ODA et al. device includes a power supply, there can also be no doubt that the DOUGLAS camera already includes a power supply. The DOUGLAS device includes the aforementioned rollers, which must be driven by a motor, which in turn, must be powered by a power supply.

Instead, the principal feature for which ODA et al. is offered is the arrangement of an elongated printing head that moves in a sub-scan direction perpendicular to a main scan direction of the printing head under the influence of a head

moving mechanism. While the ODA et al. device includes such feature, the presence of such feature cannot be divorced from the overall nature of the ODA et al. device itself.

It is significant that the ODA et al. device is neither a camera nor a printer that utilizes stored data to produce output. Instead, the ODA et al. device is a photocopier, which scans an original and then prints a reproduction of such original. This is clear not only from "copying device" in the title, but additionally from the illustration of Figure 2. Figure 2 illustrates that the fluorescent lamp 24 travels with the moving scanner 15. As the lamp and scanning device move across the original, light from the fluorescent lamp is reflected off the original, taken in by the scanning device 15, and projected onto a blank sheet 9c to produce the copy.

Since the ODA et al. device does not use stored data to produce the output, but instead simultaneously scans the original and scans the output sheet, the arrangement of the moving scan head 15 is a necessary consequence of the device. Since the scan head 15 must traverse both the original and the output sheet, the designer of such a device is left with two choices: either keep the scanning head stationary and move *both* the original and the output sheet at identical rates of speed across the stationary scanner, or instead, keep the original and the output sheet stationary while moving the scanner with respect to both. Clearly, the latter represents a much simpler arrangement and

underlies the reason that the photocopier of ODA et al. operates in much the same manner as virtually every other photocopier: the original is held stationary and the scan head traverses the original.

These characteristics do not apply to cameras in general, and certainly do not apply to the camera of the primary DOUGLAS reference. In light of the fact that the DOUGLAS reference is designed to print an image based on data stored in a memory device, the data can be read from the memory device in any manner most convenient for the printing process. Since the output print is ejected using the rollers 60 of DOUGLAS, there already exists a mechanism for moving the sheet along the plane of the sheet itself. With this structure already in place, it would be entirely redundant to separately move the print head with respect to a stationary print sheet. Instead, the print head of DOUGLAS is kept stationary while the sheet is ejected from the camera. This allows the camera to simultaneously eject the sheet and expose the same to produce the image.

Accordingly, in light of the entirely divergent functions of the DOUGLAS camera and the ODA et al. photocopier, applicants respectfully suggest that selecting the moving scan head of ODA et al. into the DOUGLAS camera would appear to be entirely at odds with the design of this type of instant camera.

As described in the Interview Summary, the interview attendees agreed that Examiner Henn would revisit the combination

of references in light of the points raised above. It was also agreed that Examiner Henn would obtain a non-automated English language translation of the applied ODA reference.

If the Examiner has any questions or requires further clarification of any of the above points, the Examiner may contact the undersigned attorney so that this application may continue to be expeditiously advanced.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON

A handwritten signature in black ink, appearing to read 'Robert J. Patch', written over a horizontal line.

Robert J. Patch, Reg. No. 17,355  
745 South 23<sup>rd</sup> Street  
Arlington, VA 22202  
Telephone (703) 521-2297  
Telefax (703) 685-0573  
(703) 979-4709

RJP/EJ:mjr/fb